

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Center City Healthcare, LLC d/b/a Hahnemann University Hospital, *et al.*,

Debtors.¹

Center City Healthcare, LLC d/b/a Hahnemann University Hospital,

Plaintiff,

v.

KCI USA INC.,

Defendant.

Chapter 11

Case No. 19-11466 (MFW)

(Jointly Administered)

Adversary No. 21-50980 (MFW)

STIPULATION EXTENDING TIME

Debtor Center City Healthcare, LLC d/b/a Hahnemann University Hospital (“Plaintiff”) and KCI USA Inc. (“Defendant,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on June 28, 2021, Plaintiff filed its complaint (A.D.I. 1) (the “Complaint”) against Defendant, initiating the above-captioned adversary proceeding (the “Adversary Proceeding”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher’s Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher’s Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors’ mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

WHEREAS, pursuant to the *Order Establishing Streamlined Procedures Governing Adversary Proceedings* (A.D.I. 9), the deadline for Defendant to answer, move or otherwise respond to the Complaint is October 15, 2021.

WHEREAS, in accordance with Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Parties have agreed to extend the time for Defendant to answer, move or otherwise respond to the Complaint through and including October 29, 2021.

THEREFORE, in consideration of the foregoing, and pursuant to Local Rule 7012-2, the Parties hereby stipulate and agree that:

1. Defendant shall have through and including October 29, 2021, to answer, move or otherwise respond to the Complaint.
2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.
3. The Court shall retain jurisdiction with respect to the enforcement, implementation and interpretation of this stipulation.

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Dated: October 15, 2021

GREENBERG TRAURIG, LLP

/s/ Alison Elko Franklin

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Dated: October 15, 2021

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